

EXHIBIT 15

EXHIBIT 15

Chart Comparing All Revised Responses for Individual Defendants

Document Demand	Question Wording	Nestro's Response	Randall's Response	Popham's Response
Document Demand #1	All documents concerning the allegations in the Retaliation Lawsuit, Complaint and/or Answer.	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #2	All documents reviewed and/or relied on in drafting these responses, or the Retaliation Lawsuit and/or Answer.	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]	See INDIV000001 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #3	All documents or correspondence of any kind which have not been previously requested, which relate in any way to, or which may lead to the discovery of relevant evidence, concerning any of the allegations set forth in the Retaliation Lawsuit, Complaint and/or Answer.	Defendant objects to this demand because it is Overly Broad, ambiguous, not reasonably limited in temporal scope and to the extent it seeks documents protected by Privilege.	Defendant objects to this demand because it is Overly Broad, ambiguous, not reasonably limited in temporal scope and to the extent it seeks documents protected by	Defendant objects to this demand because it is Overly Broad, ambiguous, not reasonably limited in temporal scope and to the extent it seeks documents protected by Privilege.
Document Demand #4	All written or oral statements or reports taken or obtained from any person(s) concerning the facts and circumstances mentioned or complained of in the Retaliation Lawsuit, Complaint and/or Answer.	Defendant objects to this demand because it is ambiguous. Defendant construes it to mean statements gathered as a result of the litigation. Assuming this is the case, such documents are protected by Privilege.	Defendant objects to this demand because it is ambiguous. Defendant construes it to mean statements gathered as a result of the litigation. Assuming this is the case, such documents are protected by Privilege.	Defendant objects to this demand because it is ambiguous. Defendant construes it to mean statements gathered as a result of the litigation. Assuming this is the case, such documents are protected by Privilege.
Document Demand #5	Originals of each and every audio or video recording, including telephone call message recordings, which you have of all conversations, including telephone conversations, with any of the PMC's owners, employees or former employees.	Defendant objects to this demand because it is Overly Broad. Subject to and without waiving this objection and the other General Objections set forth above, Defendant responds that she is not aware of any recordings responsive to this request.	Defendant objects to this demand because it is Overly Broad. Subject to and without waiving this objection and the other General Objections set forth above, Defendant responds that he is not aware of any recordings responsive to this request.	Defendant objects to this demand because it is Overly Broad. Subject to and without waiving this objection and the other General Objections set forth above, Defendant responds that he is not aware of any recordings responsive to this request.

Document Demand #6	All electronic messages, documents, correspondence, communications (including hard copy or email) or conversations between Supreme, and/or any of Supreme's owners, agents, employees, or former employees and you concerning any allegations in the Retaliation Lawsuit, Complaint and/or Answer.	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #7	All documents you copied, caused to be copied, saved, or caused to be saved, removed, caused to be removed, transferred, caused to be transferred, transmitted, caused to be transmitted, forwarded, caused to be forwarded, released, caused to be released, deleted, caused to be deleted, emailed, caused to be emailed, copied and/or caused to be copied from PMC's offices, files, computers and/or electronic devices, either by hard copy or by electronic means.	Defendant responds that she is not in possession of any PMC documents.	Defendant has paper copies of now-expired credit reports and other related documentation, which have been made available for review and copying by the Plaintiffs. Defendant further responds that he is not in possession of any other PMC information. [Revised as of March 18, 2022.]	Defendant responds that he is not in possession of any PMC documents.
Document Demand #8	All documents concerning or reflecting summaries, compilations, databases, or collections of data or information stored in PMC's offices, files, computers and/or electronic devices that you copied, caused to be copied, removed, caused to be removed, caused to be removed transferred, caused to be transferred, transmitted, caused to be transmitted, forwarded, caused to be forwarded, released, caused to be released, deleted, caused to be deleted, emailed, caused to be emailed, copied and/or caused to be copied from PMC's offices, files, computers, and/or electronic devices, either by hard copy or by electronic means.	Defendant refers Plaintiffs to her response to Demand No. 7.	Defendant refers Plaintiffs to his response to Demand No. 7.	Defendant refers Plaintiffs to his response to Demand No. 7.

Document Demand #9	Any and all emails, electronic messages and documents sent from your PMC email address to any of your personal email addresses while employed by PMC.	INDIV000042 - INDIV000452. [Revised as of March 18, 2022.]	INDIV0000016 - INDIV000026, INDIV000043 - INDIV001099, and INDIV1296 - INDIV001482. [Revised as of March 18, 2022.]	INDIV001100 - INDIV001295, and INDIV001905 - INDIV002029. [Revised as of March 18, 2022.]
Document Demand #10	Any and all emails, electronic messages, and documents sent from your PMC email address to your Supreme email address while employed by PMC.	INDIV000042 - INDIV000452. [Revised as of March 18, 2022.]	Defendant responds that he is not aware of any documents responsive to this request.	Defendant responds that he is not aware of any documents responsive to this request.
Document Demand #11	All documents including electronic messages concerning your employment at Supreme including, but not limited to, documents produced by you to Supreme or a recruiter in connection with your potential or actual employment, job application, resume, documents in connection with any recruitment to join Supreme, offers from Supreme, employment agreements or contracts and negotiations.	INDIV000033 - INDIV000038, INDIV000042 - INDIV000452, INDIV0001483 - INDIV001904, INDIV002114 - INDIV002128, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000001 - INDIV000006, INDIV000043 - INDIV001099, INDIV001296 - INDIV001904, INDIV002030 - INDIV002113, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000027 - INDIV000032, INDIV0001100 - INDIV001295, INDIV001483 - INDIV001904, INDIV002129 - INDIV002137, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #12	All documents concerning employment or potential employment at Supreme of any former or current employee of PMC, including, but not limited to, electronic messages, offers, correspondence, recruiting, employment contracts and/or terms.	INDIV000001 - INDIV000006, INDIV000027 - INDIV000038, INDIV000042 - INDIV1904, INDIV002030 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000001 - INDIV000006, INDIV000027 - INDIV000038, INDIV000042 - INDIV1904, INDIV002030 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000001 - INDIV000006, INDIV000027 - INDIV000038, INDIV000042 - INDIV1904, INDIV002030 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #13	All documents, correspondence, communications (including hard copy or email) or conversations between you and any other Defendant relating or referring to your, Randall's, and/or Popham's resignation from PMC.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]

Document Demand #14	All documents, correspondence, communications (including hard copy or email) or conversations between you and any other individual or entity relating or referring to your, Randall's, and/or Popham's resignation from PMC.	INDIV000039 - INDIV000040, INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000007 - INDIV000014, INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV002029, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #15	Copies of any text messages, social media messages, chat programs, or postings regarding your resignation of employment with PMC and/or your employment with Supreme.	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV001483 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #16	Any and all communications (in any format) with PMC's current or former employees since leaving PMC's employment.	INDIV000042 - INDIV001904 and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000007 - INDIV000014, INDIV000042 - INDIV001904 and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #17	Any and all journals, diaries, memoirs, accounts, chronicles, logs, logbooks or blogs that you have used, utilized, made entries in since the commencement of your employment at PMC.	Defendant responds that she is not aware of any documents responsive to this request.	Defendant responds that he is not aware of any documents responsive to this request.	Defendant responds that he is not aware of any documents responsive to this request.
Document Demand #18	All documents and data, including, but not limited to, computer generated or stored information, concerning any and all persons or entities contacted by you or any Defendant concerning customers of PMC, potential customers of PMC, customers in the pipeline of PMC, and leads of potential customers of PMC from January 2017 to date.	INDIV000007 - INDIV000014, INDIV000016 - INDIV000026, INDIV000039 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000007 - INDIV000014, INDIV000016 - INDIV000026, INDIV000039 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000007 - INDIV000014, INDIV000016 - INDIV000026, INDIV000039 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]

Document Demand #19	All documents between you and any other Defendant concerning customers of PMC, potential customers of PMC, customers in the pipeline of PMC, and leads for potential customers of PMC from January 2017 to date.	INDIV000042 - INDIV001904 and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904 and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904 and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #20	Any documents concerning the protection, limited use, or dissemination of any PMC information once you were employed by Supreme.	INDIV000033 - INDIV000038, INDIV002114 - INDIV002128. Also responsive to this request is her Outside Loan Originator Employment Agreement with PMC, which is already in the Plaintiffs' possession.	INDIV000001 - INDIV000006, INDIV002030 - INDIV002113. Also responsive to this request is his Outside Loan Originator Employment Agreement with PMC, which is already in the Plaintiffs' possession.	INDIV000027 - INDIV000032, INDIV002129 - INDIV002137.
Document Demand #21	Any and all communications (in any format) concerning customers of PMC, potential customers of PMC, customers in the pipeline of PMC, and leads for potential customers of PMC since you left PMC's employment.	INDIV000039 - INDIV000040. Responsive information may also be found in INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000007 - INDIV000014. Responsive information may also be found in INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #22	All records concerning commissions, salary, reimbursements, legal fees or other compensation paid to you or on your behalf of you, by Supreme.	INDIV000033 - INDIV000038, INDIV002114 - INDIV002128. [Revised as of March 18, 2022.]	INDIV000001 - INDIV000006, INDIV002030 - INDIV002113. [Revised as of March 18, 2022.]	INDIV000027 - INDIV000032, INDIV002129 - INDIV002137. [Revised as of March 18, 2022.]
Document Demand #23	All documents that concern your alleged unpaid commissions while at PMC.	Defendant objects to the extent this request seeks documents protected by Privilege. Without waiving this objection, Defendant states that she possesses no documents responsive to this request except for her Outside Loan Originator Employment Agreement with PMC, which is already in the Plaintiffs' possession. Plaintiffs possess the documents necessary to calculate the unpaid commissions.	Defendant objects to the extent this request seeks documents protected by Privilege. Without waiving this objection, Defendant states that she possesses no documents responsive to this request except for her Outside Loan Originator Employment Agreement with PMC, which is already in the Plaintiffs' possession. Plaintiffs possess the documents necessary to calculate the unpaid commissions.	Defendant is not alleging that he is owed any commissions from his employment with PMC.

Document Demand #24	All documents that concern any allegations that Mr. Donoghue interfered with your business relationships.	INDIV000040 - INDIV000041.	Defendant objects to the extent this request seeks the production of documents protected by Privilege. Subject to and without waiving this objection, Defendant states that he is not in possession of documents responsive to this request.	Defendant objects to the extent this request seeks the production of documents protected by Privilege. Subject to and without waiving this objection, Defendant states that he is not in possession of documents responsive to this request.
Document Demand #25	All documents, correspondence, communications (including hard copy or email) or conversations between Mr. Donoghue and any real estate agent with whom you had or have a relationship with.	Defendant does not possess any documents responsive to this request.	Defendant does not possess any documents responsive to this request.	Defendant does not possess any documents responsive to this request.
Document Demand #26	All documents that concern, contain, refer or relate, in any way, to statements made by any Defendant, or by any Defendant's representative, servant, agent, employee and/or former employee, regarding the dissemination, distribution, detailing, disclosure or sharing of the complaint in the Retaliation Lawsuit or the allegations contained therein.	INDIV000015, INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000015, INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000015, INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #27	All correspondence, communications (including hard copy or email) or conversations between any Defendant and any other Defendant relative to the dissemination, distribution, detailing, disclosure or sharing of the complaint filed in the Retaliation Lawsuit or the allegations contained therein.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]

Document Demand #28	All electronic messages sent from or received by: (1) you; (2) Randall; (3) Popham; (4) any representative of Supreme, including, but not limited to representatives, recruiters and agents; (5) former employees of PMC; (6) current employees of PMC; (7) real estate agents; (8) current or former customers of PMC; (9) individuals who referred customers or potential customers to you while employed at PMC; and (10) friends, acquaintances and/or relatives, during the dates of January 1, 2019 through September 1, 2019, concerning: (a) Mr. Donoghue's alleged harassing behavior; (b) your mental and physical health; (c) your employment at PMC; (d) your employment at Supreme; (e) the criminal charges against you relating to the tampering with the PMC computers and systems; and (f) any former or current PMC employee at Supreme.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	Defendant objects to this demand because it is Overly Broad and unduly burdensome and to the extent it seeks documents protected by Privilege. It also appears to apply to Ms. Nostro.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #29 - Popham	All electronic messages sent or received from the commencement of your employment at PMC until the date of these demands in or custody or control or in which you have access to concerning: (a) Mr. Donoghue's alleged harassing behavior; (b) your employment at PMC; (c) your employment at Supreme; (d) the criminal charges concerning PMC's computers; and (f) any former or current PMC employee at Supreme.	N/A	N/A	Defendant objects to this demand because it is Overly Broad and unduly burdensome and to the extent that it seeks documents protected by Privilege. It also appears to be directed to Ms. Nostro.
Document Demand #29 - Randall & Nostro	All electronic messages sent from or received by: (1) you; (2) your daughter; (3) your daughter's biological father; and/or (4) any other of your relatives concerning: (a) your daughter's attendance at PMC events; and/or (b) alleged inappropriate communications between Mr. Donoghue and your daughter since your employment at PMC.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	Defendant objects to this demand because it is Overly Broad and unduly burdensome and to the extent it seeks documents protected by Privilege. This demand appears to apply to Ms. Nostro. Defendant has no non-privileged documents responsive to this request.	N/A

Document Demand #30 Nostro and Randall	All electronic messages sent from or received by: (1) you; (2) any third party; (3) your daughter; (4) your daughter's biological father; and/or (5) any other of your relatives concerning: (a) your daughter's attendance at PMC events; (b) alleged inappropriate communications between Mr. Donoghue and your daughter at any time; and/or (c) your daughter's observation of any alleged inappropriate communications or actions as between you and Mr. Donoghue.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	Defendant objects to this demand because it is Overly Broad and unduly burdensome and to the extent it seeks documents protected by Privilege. This demand appears to apply to Ms. Nostro. Defendant has no non-privileged documents responsive to this request.	N/A
Document Demand #30 Popham	All electronic messages sent after January 1, 2019 in your custody or control, or to which you have a right of access containing any of the following terms: (1) sexual; (2) harassment; (3) hostile; (4) work environment; (5) Donoghue; (6) Premium; (7) Supreme; (8) Randall; (9) erase (with respect to computer records); (10) leverage; (11) settlement; (12) class action; (13) discrimination; (14) non-compete; (15) lawsuit; and (16) Mike.	N/A	N/A	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]
Document Demand #31	All electronic messages sent or received from the commencement of your employment at PMC until the date of these demands in or custody or control or in which you have access to concerning: (a) Mr. Donoghue's alleged harassing behavior; (b) your mental and physical health; (c) your employment at PMC; (d) your employment at Supreme; (e) the criminal charges against you concerning PMC's computers; and (f) any former or current PMC employee at Supreme.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	Defendant objects to this demand because it is Overly Broad, non-specific, and ambiguous, and to the extent that it seeks documents protected by Privilege. It also appears to be directed to Ms. Nostro.	N/A
Document Demand #32	All electronic messages sent after January 1, 2019 in your custody or control, or to which you have a right of access containing any of the following terms: (1) sexual; (2) harassment; (3) hostile; (4) work environment; (5) Donoghue; (6) Premium; (7) Supreme; (8) Randall; (9) erase (with respect to computer records); (10) leverage; (11) settlement; (12) class action; (13) discrimination; (14) non-compete; (15) lawsuit; and (16) Mike.	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	INDIV000042 - INDIV001904, and INDIV002138 - INDIV003460. [Revised as of March 18, 2022.]	N/A